

Woolfolk Alliance Group Concerns
1999-2000

There are 3 areas of concern that were brought to the attention of Superfund site assessment personnel in 1999-2000 by the Woolfolk Alliance Group: 1) The Vienna St. Dump Site itself; 2) areas around and on the Vienna Street Dump Site used as paths, cut-throughs and a playground and 3) Griffin Line Community. The Griffin Line Community is a residential area where trucks from Woolfolk reportedly traveled on the way to the Vienna Street Dump. The Vienna Street Dump and the paths, cut-throughs and the playground are discussed together since they are directly adjacent to each other and were evaluated together.

Vienna St. Dump Site
Fort Valley, Georgia

This actual dump site, the Vienna Street Dump or VSD, was originally evaluated in 1994 (Preliminary Assessment or PA) and 1995 (Site Inspection or SI). The site was given a "No Further Remedial Action Planned" or NFRAP designation in 1995 as a result of the SI. In 2000, the Woolfolk Alliance Group expressed concern to EPA that the groundwater portion of the SI Report provided insufficient data to document the groundwater pathway and asked that EPA re-evaluate the VSD site.

Furthermore, the local citizens expressed concern that areas both on-site and off-site of the VSD dump were frequented by neighborhood children and adults using paths and cut-throughs and represented a possible human exposure of hazardous constituents from the Vienna Street Dump (VSD) property. The citizens spoke of 3 areas of concern: 1) a cut-through path leading from the Indian Oaks Apartment complex north through the dump; 2) a westerly foot path leading from the Indian Oaks Apartment complex to the adjacent city park; and 3) the Indian Oaks Playground, which was suspected to have been filled in with landfill waste or on-site soils during construction of the Indian Oaks Apartment complex.

Upon review of the 1995 SI, EPA determined it appropriate to conduct a Site Reassessment of the VSD Site. Included in the Reassessment were soil samples designed to address the citizens' concerns for the cut-through, path and playground since these areas were adjacent to the VSD. In August 2000, EPD (under the PA/SI Cooperative Agreement) collected seven surface and five subsurface samples from the VSD property and the off-site areas of concern for analysis. Due to failed attempts (in August and December 2000) to reach groundwater using DPT, EPA's SESD and START-2 personnel installed temporary monitoring wells using a drill rig, which could access greater depths. Samples were taken from these wells in April 2001.

Soil Results:

VSD property:

Source samples indicated elevated arsenic, lead, barium, silver, mercury, alpha-BHC, chlordane, 4,4'-DDD, DDE, DDT, toxaphene and lindane (gamma-BHC), carbon



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disulfide and chlorobenzene.

Playground: (surface)	<u>Residential PRG</u>		
	Barium	50-61 mg/kg	5,400 mg/kg
	Benzene	0.0095 mg/kg	0.64 mg/kg
	Toluene	0.0074 mg/kg	520 mg/kg

(Subsurface concentrations of barium, chromium, copper and lead ranging from 5.3 mg/kg to 62 mg/kg; all well below residential PRGs).

Pedestrian path thru VSD property:	<u>Residential PRG</u>		
	Arsenic	69 mg/kg	0.39 mg/kg (1.6 industrial)
	Lead	56 mg/kg	400 mg/kg
	Acetone	0.13 mg/kg	14,000 mg/kg

Pedestrian path to city park:	<u>Residential PRG</u>		
	Nickel	13 mg/kg	1,600 mg/kg

Except for the arsenic in the cut-through, all other concentrations in areas of concern easily accessed by people were well below residential PRGs.

Groundwater results showed the following releases to the surficial aquifer: arsenic, barium, cadmium, cobalt, copper, lead, manganese, selenium, thallium, titanium, yttrium, and zinc. Lead at 48 ug/L was the only constituent above the MCL of 15 ug/L. Arsenic was present at 19 ug/L in two wells. In January 2006, the arsenic MCL was lowered to 10 ug/L making these wells now over the MCL for arsenic.

1,2-dichloropropane was above the MCL at 8.6 ug/L (MCL 5 ug/L); caprolactam elevated at 600 ug/L but below the MCL of 18,000 ug/L.

Fort Valley residents and much of the surrounding area obtain their water from the Fort Valley Utility Commission, which obtains its water from wells screened within the Tuscaloosa aquifer. Clay confining layers exist between the surficial, Providence and Tuscaloosa aquifers which would inhibit the vertical migration of constituents between aquifers. Additionally, the nearest private well is over 0.75 mile away and was found not to be affected by the site during the 1995 SI.

The site scored a total of 26.12, which is below the 28.5 HRS cutoff. The groundwater pathway scored low due to a lack of targets. The surface water pathway scored low due to low number of targets downstream of the facility. For the soil exposure pathway, the main concern was the constituents which were detected at elevated concentrations along the cut-through path through the VSD property (particularly arsenic). This pathway scored low because the former dump is not "used for public recreation" and pedestrians are considered to be trespassers in this scenario and do not score as high as if they had been residential targets.

Regarding the arsenic level found in the cut-through path at a level of 69 mg/kg: This level is below industrial removal screening levels (160 mg/kg), but above residential removal screening levels (40 mg/kg). The VSD property is owned by the city and is industrial. At the time that the sample results came out, Mario Villamarzo and Carolyn Callihan (Thompson) spoke with Mayor Stumbo and Claude Terry (TAG advisor for the Woolfolk site) about the arsenic concentration. Mario and I told the Mayor that he needed to fence the dump property to control access through the cut-through path. Since it was an industrial property, trespassers should be prevented from accessing the property and it was the City's responsibility to do so.

EPA NFRAP'd the VSD site on December 17, 2001, and referred the site to GA EPD for further consideration on December 26, 2001. GA EPD now has this site on the Hazardous Site Inventory (HSI). The current HSI site status reads: "This site has a known release of arsenic in groundwater at levels exceeding the reportable quantity. No human exposure via drinking water is suspected from this release. The nearest drinking water well is between 1 and 2 miles from the area affected by the release. The site has a known release of arsenic in soil at levels exceeding the reportable quantity. This site has unlimited access. The nearest resident individual is less than 300 feet from the area affected by the release....EPD has not yet directed the responsible parties to begin investigation or cleanup under HSRA for source materials, soil and groundwater." Kelly Norwood is the project manager. I spoke with her on 3/1/06; she has not yet initiated the call-in for a compliance status report from the City of Fort Valley.

Griffin Line Community
Fort Valley, Georgia

In response to concerns from the community regarding possible exposure to hazardous substances from industrial waste deposited or burned in the now closed Vienna Street Dump (VSD), presumably from Woolfolk Chemical's operations, ATSDR conducted a health consultation finalized on October 31, 2000. The Woolfolk facility transported its waste along streets through the Griffin Line neighborhood on the way to the VSD. According to the citizens, some of these chemicals spilled along the roadside and possibly on to their yards.

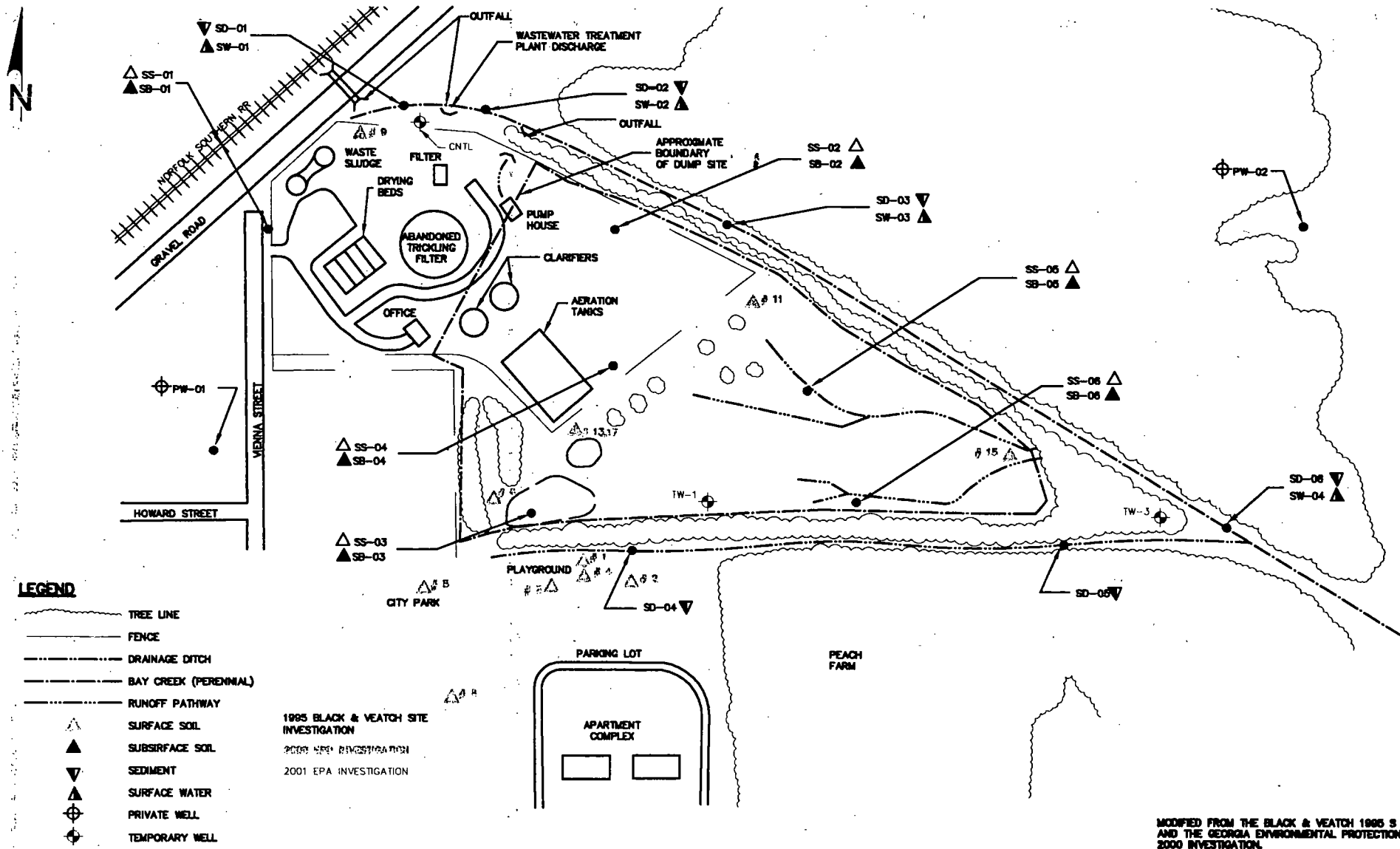
Citizens were also concerned that contaminated soil from the VSD may have been used in the construction of the playground that lies between the VSD and a neighboring apartment complex. Approximately 500 people live within 500 feet of the closed VSD. (As discussed above, the VSD has been NFRAP'd. While hazardous constituents were detected in the playground soils adjacent to the VSD, all concentrations were at levels significantly below EPA Region 9's Preliminary Remediation Goals (PRGs) for residential soils meaning that the presence of these constituents did not represent a health concern to the residents of the apartment complex. Also, the foot path to the city park near the VSD and the apartment complex did not represent a health threat to residents. The cut-through on VSD property did contain arsenic at a level that is above the PRG for residential soils. However, the VSD property is industrial, not residential, and the concentration of arsenic detected was well below the PRG for industrial soils. To prevent residents from exposure to these industrial soils, EPA notified the Mayor of Fort Valley that the City of Fort Valley should prevent access to the cut-through path by erecting a fence or other suitable access barrier.

The remaining area of concern for the Woolfolk Alliance Group was the roadways leading to the VSD in the "Griffin Line" neighborhood. In December 1999, ATSDR collected 21 discrete (grab), dry surface soil samples (0-3") in the Griffin Line neighborhood. Seventeen of these were from residential properties along the haul routes where spillage reportedly occurred in the past. Six additional soil samples were taken from a street corner, an empty lot next to the Shiloh Church building and 3 samples from the playground of the apartment complex (the same playground evaluated in the Site Reassessment for the VSD site). The samples were tested for metals and organochlorine pesticides.

All of the soil samples tested below levels of health concern for metals and pesticides, except one grab sample collected from the front yard of 106 Hiley Street. This yard revealed toxaphene at 150 ppm, DDT at 3.25 ppm and DDD at 1.87 ppm. ATSDR stated that this level of toxaphene "may pose a health hazard for children if they played with the yard soil on a regular basis." However, the homeowner stated that there were no children residing or playing on that property at the time. Since only one sample showed an exceedance of any constituent of concern, ATSDR stated that the possible sources of contamination included "intentional garden application in the past, isolated deposition of agricultural chemicals in the yard or possible laboratory error." On October 31, 2000, ATSDR published the Health Consultation, which recommended that further testing of the one yard be performed, and referred the issue to EPA.

EPA's Emergency Response and Removal Branch (ERRB) and On-Scene Coordinator Katrina Jones conducted a removal assessment (March 28, 2001) along Hiley Street, where the earlier detection of 150 ppm toxaphene had been found. Composite (not grab) samples were collected from six properties along the street to better define the extent of contamination. Results of the composite sample analysis revealed the highest level of toxaphene to be 8.7 ppm at the same address where the 150 ppm had been found. ERRB determined that this level did not pose an immediate threat to the public health or environment. Dieldrin was detected on two separate properties just above the screening level of 30 ppb. Other pesticides, such as DDT, DDE, endrin ketone and chlordane were also detected, but were below the screening levels. ERRB concluded that the property at 106 Hiley Street did not meet the criteria for a removal action. Note: ERRB typically uses composite sampling (vs. grab sampling) in residential yards when determining the need for an emergency removal action.

Since the one detection was isolated and the Vienna Street Dump site was NFRAP'd, further Superfund site assessment of the Griffin Line community was not conducted.



MODIFIED FROM THE BLACK & VEATCH 1985 S I REPORT AND THE GEORGIA ENVIRONMENTAL PROTECTION DIVISION 2000 INVESTIGATION.



VIENNA STREET DUMP FORT VALLEY, PEACH COUNTY, GEORGIA

SAMPLING LOCATION MAP

FIGURE 3

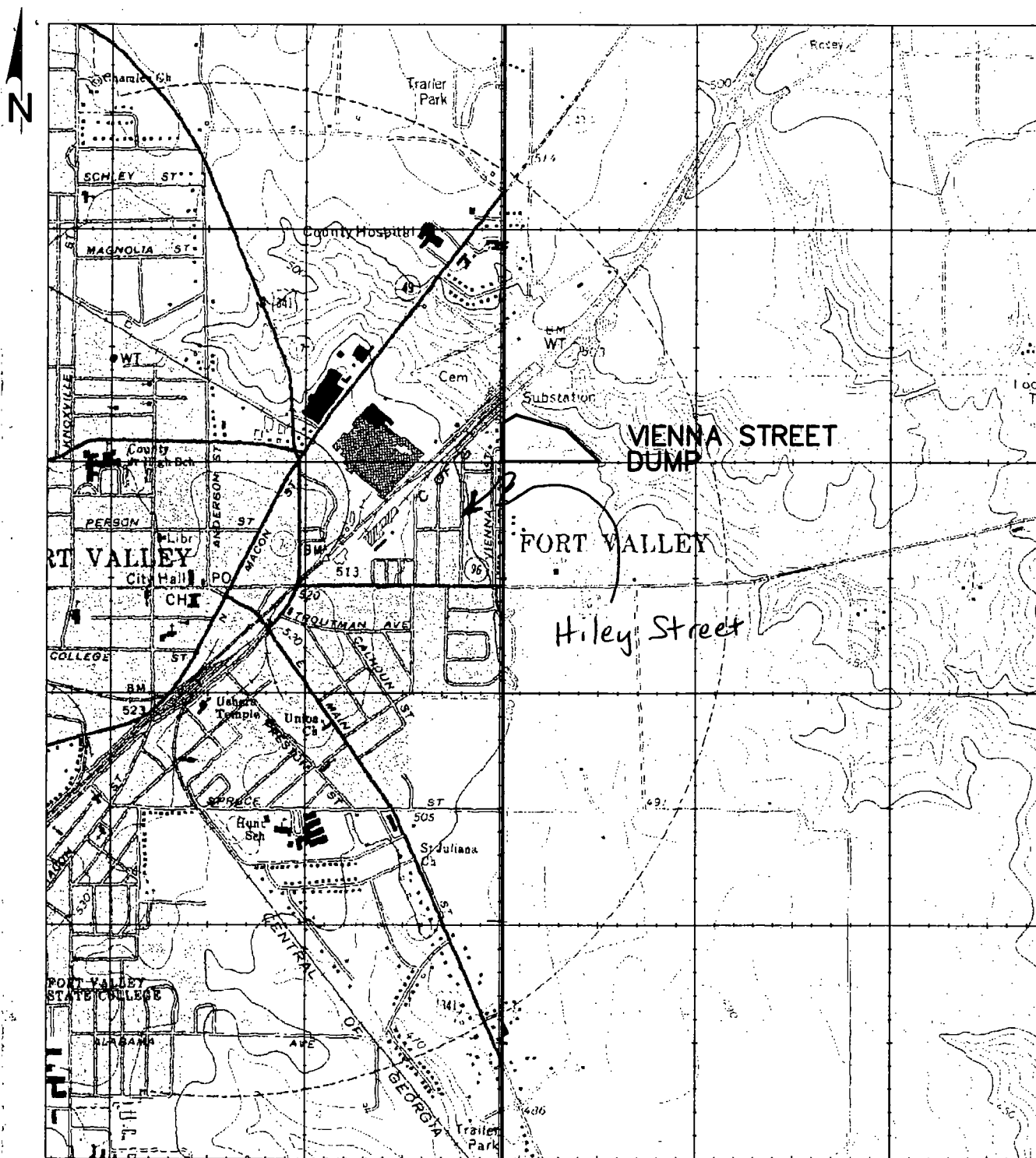
ROY F. WESTON, INC.

WESTON

MANAGERS DESIGNERS/CONSULTANTS

DRAWN: M. SNEED	DATE: 11/28/01	W.O. NO.: vienna.dwg
SCALE: N.T.S.	EPA ID NO: GAD000048934	TDD NO: 4W-01-11-A-012





MODIFIED U.S.G.S. QUAD FORT VALLEY EAST MAP (7.5 SERIES), DATED 1999, SCALE: 1:2000

VIENNA STREET DUMP FORT VALLEY, GEORGIA

GENERAL SITE LOCATION MAP

FIGURE 1

ROY F. WESTON, INC.



MANAGERS

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AS NOTED

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